

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION

In re: Bradley William Lang, Debtor )  
 )

Case No. 16-32482-KLP  
Chapter 13

**TRUSTEE'S RESPONSE TO DEBTOR'S MOTION FOR HARDSHIP DISCHARGE  
AND REQUEST FOR HEARING**

COMES NOW Suzanne E. Wade, Chapter 13 Trustee, and files this response to the Debtor's Motion for Hardship Discharge, as follows:

1. The Debtor filed this Chapter 13 Petition, now pending in the United States Bankruptcy Court, Eastern District of Virginia, Richmond Division, on May 17, 2016 under 11 U.S.C Chapter 13.
2. Suzanne E. Wade has been appointed as the Chapter 13 Trustee in this case and continues to serve as the Trustee.
3. On February 22, 2021 the Debtor filed a Motion for Hardship Discharge due to decreased income resulting from COVID-19.

WHEREFORE, the Chapter 13 Trustee, respectfully requests the Court set for hearing the Debtor's Motion for Hardship Discharge.

Respectfully submitted,

Date: March 2, 2020

/s/ Suzanne E. Wade  
Chapter 13 Trustee

## CERTIFICATE OF SERVICE

I hereby certify a true copy of the foregoing TRUSTEE'S RESPONSE TO THE DEBTOR'S MOTION FOR HARDSHIP DISCHARGE was served electronically or by first-class mail, postage prepaid, this 2nd day of March 2021, upon the following parties:

Bradley William Lang  
38 Kennon Road  
Mineral, VA 23117

Suzanne E. Wade, Chapter 13 Trustee  
Virginia State Bar Number 31868  
7202 Glen Forest Drive, Suite 202  
Richmond, VA 23226  
(804) 775-0979

James E. Kane  
Kane & Papa, PC  
1313 East Cary Street  
P.O. Box 508  
Richmond, VA 23218-0508  
[jkane@kaneandpapa.com](mailto:jkane@kaneandpapa.com)

Daniel Kevin Eisenhauer  
Orlans, PC  
PO Box 2548  
Leesburg, VA 20177  
[ANHSEOrlans@InfoEx.com](mailto:ANHSEOrlans@InfoEx.com)

Johnie Rush Muncy  
Samuel I. White, P.C.  
1804 Staples Mill Road  
Suite 200  
Richmond, VA 23230  
[jmuncy@siwpc.com](mailto:jmuncy@siwpc.com)

Credit One Bank Na  
Po Box 98873  
Las Vegas, NV 89193

Daniel L. Rosenthal  
2819 N Parham Rd.  
Suite 110  
Henrico, VA 23294

Internal Revenue Service  
Kansas City, MO 64999-0002

Jl Walston & Associate  
1107 West Main St., Suite 201  
Durham, NC 27701

Kohls/Capital One  
Po Box 3120  
Milwaukee, WI 53201

Professional Restoration Serv.  
4965 Cox Rd.  
Glen Allen, VA 23060

Suzanne E. Wade, Chapter 13 Trustee  
Virginia State Bar Number 31868  
7202 Glen Forest Drive, Suite 202  
Richmond, VA 23226  
(804) 775-0979

Seterus  
PO Box 1077  
Hartford, CT 06149-1077

Transworld Sys Inc/38  
507 Prudential Rd  
Horsham, PA 19044

UVA Physicians Group  
500 Ray C Hunt Dr.  
Charlottesville, VA 22903

Verizon  
500 Technology Dr Suite 500  
Weldon Spring, MO 63304

Virginia Emergency Physicians  
1602 Skipwith Road  
Henrico, VA 23229

/s/ Suzanne E. Wade  
Chapter 13 Trustee

Suzanne E. Wade, Chapter 13 Trustee  
Virginia State Bar Number 31868  
7202 Glen Forest Drive, Suite 202  
Richmond, VA 23226  
(804) 775-0979